



Northern Natural Gas Company  
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402 398-7200

June 13, 2019

***Via eFiling***

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

RE: **Northern Natural Gas Company  
Northern Lights 2019/Rochester Expansion Projects  
Docket No. CP18-534-000  
Request Notice to Proceed - LaCrosse Branch Line MAOP Uprate and  
Relocation of MAOP Regulator**

Dear Ms. Bose:

Northern Natural Gas Company (Northern) hereby submits for filing with the Federal Energy Regulatory Commission (Commission) in the above-referenced docket its request for approval to commence the (1) uprate of the maximum allowable operating pressure (MAOP) of the 8-mile segment of the LaCrosse branch line loop; and (2) relocate the MAOP regulator.

In accordance with Condition 9 of the Order, attached is an updated Authorization Status table demonstrating Northern has received all applicable authorizations required under federal law. On April 1, and April 19, 2019, in response to Condition 15 of the Order, Northern submitted correspondence from the Minnesota State Historic Preservation Office (SHPO) and Upper Sioux Community Tribal Historic Preservation Officer (THPO) demonstrating completion of the Section 106 consultation with the SHPO and THPO for all project components. In addition, Northern filed its Implementation Plan in compliance with Condition 6 of the Order February 27, 2019. Northern has received all necessary land rights to conduct and operate the MAOP uprate and MAOP regulator relocation.

With the information provided in this filing, responses submitted to the Commission February 27, 2019, April 1, 2019, and April 19, 2019, and the affirmation that Northern holds the necessary land rights, Northern respectfully requests Commission staff issue approval to commence the MAOP uprate on the 8-mile segment of the LaCrosse branch line loop and the relocation of the MAOP regulator. Northern

Northern Natural Gas Company  
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respectfully requests that the Commission issue an order as expeditiously as possible in order for the facilities to be in-service to meet customer requirements by November 1, 2019.

Any questions regarding this filing should be directed to the undersigned at (402) 398-7103.

Respectfully Submitted,

/s/ Michael T. Loeffler

Michael T. Loeffler,  
Senior Director, Certificates and External Affairs

Authorization Status		
Agency Name	Permit/Authorization/Letter of Concurrence	Status
FERC	Certificate for construction and operation of interstate natural gas transmission pipeline facilities <sup>1</sup>	Issued February 21, 2019
EPA	Clean Air Act permits and approvals	Delegated to the state (MPCA)
	CWA Section 401 Water Quality Certification	Delegated to the state (MPCA)
	CWA Section 402 permits for wastewater or stormwater discharges	Delegated to the state (MPCA)
NRCS	Conservation Easement Program and seeding recommendations; Conservation Reserve Program <sup>1</sup>	Consultation complete March 2018.
USACE – St. Paul District	CWA Section 404 – Dredge and Fill Permit; Section 10 Rivers and Harbors Act <sup>1</sup> Utility Regional General Permit without preconstruction notification	Concurrence December 11, 2018
USFWS – Twin Cities Field Office	Section 7 Endangered Species Act, Bald and Golden Eagle Protection Act, and MBTA <sup>1</sup> No effect for all species, except northern long-eared bat 4D rule	Consultation complete December 21, 2018
Native American Tribes	NHPA and Section 106 consultation to determine if the project will have impact on receptors of Native American cultural importance <sup>1</sup>	The Upper Sioux Community cultural resources monitor is currently on the Alexandria branch line loop extension project and will be on Rockford to Buffalo greenfield lateral
MPCA	For the Faribault compressor station, Clean Air Act, Prevention of Significant Deterioration Minor Construction/Title V Major Air Operations Permit. For the Carver and Owatonna compressor stations, Clean Air Act, Prevention of Significant Deterioration Minor Construction/Title V Minor Air Operation Permit <sup>2</sup>	Permit applications submitted September 28, 2018.  Permit for the Owatonna compressor station received February 25, 2019. Faribault

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		received April 26, 2019. Carver received May 9, 2019
	Section 401 Water Quality Certification <sup>1</sup>	Authorization concurrent with USACE Section 404 approval. No individual 401 certification will be required.
	NPDES Stormwater Permit <sup>1</sup>	Owatonna, Faribault, and Carver compressor stations received March 15, 2019. New Prague branch line and Alexandria branch line received April 16, 2019. Rockford to Buffalo received April 26, 2019, Rochester received May 1, 2019. Willmar C-line received May 10, 2019.
	NPDES Trench Water Discharge Permit <sup>1</sup>	Owatonna, Faribault, and Carver compressor stations received March 15, 2019. New Prague branch line and Alexandria branch line received April 16, 2019. Rockford to Buffalo received April 26, 2019, Rochester received May 1, 2019. Willmar C-line submitted April 16, 2019, anticipated May 16, 2019.
MDNR	State License to Cross Public Lands and Waters <sup>1</sup>	Received April 25, 2019.
	State Protected Species Consultation <sup>1</sup>	Consultation complete December 20, 2019
	Water Appropriation Permit General Permit 1997-0005 <sup>1</sup>	Faribault compressor station received March 15, 2019. Owatonna compressor

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		<p>station received March 19, 2019. Carver compressor station received March 21, 2019.</p> <p>New Prague branch line received April 8, 2019.            Alexandria branch line received April 9, 2019.            Rockford to Buffalo greenfield received April 11, 2019. La Crosse branch line MAOP uprate and Willmar C-line received April 12, 2019.            Rochester received April 26, 2019</p>
Minnesota Historical Society - SHPO	Section 106 Consultation, NHPA <sup>1</sup>	The MN SHPO provided concurrence with findings of either “no historic properties affected,” or “no adverse effect on historic properties” for all project facilities April 18, 2019.
Township Cooperative Planning Association- Olmsted County	Grading permit <sup>3</sup>	Obtained May 7, 2019
Soil and Water Conservation District-Olmsted County	Grading permit/wetland permit <sup>3</sup>	USACE coordinated concurrence December 11, 2018
Pioneer-Sarah Creek Watershed Management Commission <sup>2</sup>	Wetland permit <sup>2</sup>	USACE coordinated concurrence December 11, 2018

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Olmsted County SWCD	Wetland delineation concurrence for the Rochester project	USACE coordinated concurrence December 11, 2018
Wright County SWCD	Wetland delineation concurrence for the Rockford to Buffalo project <sup>2</sup>	USACE coordinated concurrence December 11, 2018

<sup>1</sup> Permit applications and authorizations apply to both the Rochester Project and NL 2019 Project

<sup>2</sup> Permit applications and authorizations apply to only NL 2019 Project

<sup>3</sup> Permit applications and authorizations apply to only the Rochester Project